

**Before the
Federal Communications Commission**

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|----------------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| E911 Requirements for IP-Enabled |) | WC Docket No. 05-196 |
| Service Providers |) | |
| |) | |

**SUBSCRIBER NOTIFICATION REPORT
OF COMCAST CORPORATION**

Pursuant to Public Notice issued by the Enforcement Bureau (“Bureau”) of the Federal Communications Commission (“Commission”) in WC Docket No. 05-196,¹ Comcast Corporation (“Comcast”) submits this report documenting compliance with the Commission’s recently adopted Enhanced 911 (“E911”) requirements² on behalf of Comcast subsidiaries that are currently providing interconnected voice over Internet protocol (“VOIP”) services.³

Comcast takes the security of its voice customers seriously. For that reason, Comcast has designed its interconnected VOIP services to include 911 and E911 functionality and back-up power for possible outages in a customer’s home or in its network. Comcast also shares the Commission’s goal to ensure that customers of interconnected VOIP services have complete and accurate information about any circumstances in which 911 or E911 functionality may be in

¹ Enforcement Bureau Provides Guidance to Interconnected Voice over Internet Protocol Service Providers Concerning the July 29, 2005 Subscriber Notification Deadlines, *Public Notice*, WC Docket Nos. 04-36 and 05-196 (rel. July 26, 2005).

² IP-Enabled Services and E911 Requirements for IP-Enabled Service Provider, First Report and Order and Notice of Proposed Rulemaking, WC Docket Nos. 04-36 and 05-196 (rel. June 3, 2005) (“VOIP E911 Order”).

³ This filing encompasses Comcast’s primary IP-enabled voice service as well as an IP-enabled service Comcast provides to a limited number of circuit-switched telephone customers in the Detroit, Michigan area. These services are referred to collectively as “interconnected VOIP service.”

some way limited or unavailable. Comcast welcomes this opportunity to provide the Commission with an update on the measures Comcast has taken to ensure that its customers are aware of and understand the circumstances under which E911 service may be limited or unavailable. The report below discusses mechanisms that Comcast had in place prior to the Commission's VOIP E911 Order, as well as additional measures Comcast has implemented in response to the Commission's recent decision.

BACKGROUND

Comcast Corporation is principally involved in the development, management, and operation of broadband cable networks and programming content. Comcast Cable Communications, LLC, is the largest cable company in the United States, serving more than 21 million cable subscribers. Through its operating subsidiaries, Comcast Corporation also provides telecommunications services to residential and business customers in various portions of the United States. In addition to providing traditional, circuit-switched telecommunications services, in the Detroit market, Comcast has been using IP technology in the access network connected to the Class 5 switch serving its cable telephony customers. More recently, Comcast launched a new service that uses soft switches and Internet Protocol to transmit voice over its private, managed network.

Comcast's IP-enabled voice service was first launched on a trial basis in the spring of 2004. It is now available to residential customers in seven markets. Comcast's voice service uses Internet protocol technology but does not use the public Internet. Rather, voice traffic travels over Comcast's own managed network, allowing Comcast to provide reliable performance for its voice customers.

As an experienced provider of traditional circuit-switched telephony, Comcast understands the importance of providing reliable E911 service to customers of interconnected VOIP services. For that reason, E911 is automatically provisioned with the initial installation of all of Comcast's voice services, including its interconnected VOIP service. Newly installed voice customers do not need to call Comcast or take any other action in order to activate E911 or to place emergency calls and to have their location information and telephone number supplied to the public safety answering point ("PSAP") automatically during the 911 call.

Comcast partners with its affiliated competitive local exchange companies in each state to deliver E911 functionality to customers of its interconnected VOIP service. 911 calls from customers of Comcast's interconnected VOIP service are routed to the appropriate 911 tandem switch that is part of the existing E911 infrastructure and carry traditional Automatic Number Identification ("ANI") and Automatic Location Identification ("ALI") information, just like 911 calls made via circuit-switched plain old telephone service ("POTS"). Comcast has worked directly with state and local agencies responsible for emergency services to set up and test its 911 trunking. No new PSAP equipment or training was required.

In addition to ensuring that all newly installed voice customers have E911 service, Comcast is able to directly update and correct the location information for its voice customers in the ALI database. In the event that a customer notifies Comcast about a change to his or her account that may impact E911 service, Comcast will update the ALI database accordingly. Comcast also takes proactive measures to ensure that the information in the ALI database is accurate by performing an annual database reconciliation for each of its customers in every ALI database nationwide. Moreover, in accordance with its preexisting circuit-switched telephony

practice, Comcast provides contact information for PSAP operators to investigate ALI discrepancies twenty-four hours per day, seven days per week.

As an additional safety measure, the multimedia terminal adapter (“MTA”), a piece of equipment supplied by Comcast which is necessary to access the IP-enabled voice service, includes a battery that enables the MTA to remain operational for up to several hours in the event there is a power outage in the customer’s home. Accordingly, battery back-up power is provided to all customers of Comcast’s IP-enabled voice service.⁴ Comcast also provides backup power on the private, managed network used to transmit IP-enabled voice service. In the event of a power outage in the network, backup power is available for up to several hours. In addition, Comcast continually monitors the batteries and power supplies in its network to ensure these devices are working properly.

DISCUSSION

Even prior to the Commission’s VOIP E911 Order, Comcast has worked to ensure that customers of its interconnected VOIP service understand how the service supports 911 and E911. In addition, in response to the Commission’s VOIP E911 Order, Comcast has undertaken specific additional measures to enhance compliance with the Commission’s requirements. Comcast has also worked cooperatively with other providers through the National Cable and Telecommunications Association to develop best practices towards achieving meaningful compliance with the Commission’s objectives, including by sharing procedures and examples.

⁴ By comparison, customers of circuit-switched telephone service may rely on a cordless telephone handset that is not operable during a power outage. The Consumer Electronics Association estimates that, as of 2005, eighty-eight percent of households in the United States have a cordless telephone handset. *See* <http://www.ce.org/publications/vision/2005/julaug/p33.asp>

Since the inception of its IP-enabled voice service, Comcast has provided each customer—prior to service initiation—with a copy of a user guide. That guide explains prominently that the service address on the customer’s account must match the customer’s physical location for E911 to work properly (*see* Attachment A). Furthermore, the user guide refers customers to the Residential Subscriber Agreement (“Subscriber Agreement”) for more detailed information about potential limitations of 911/E911.

The Subscriber Agreement is provided to all new customers prior to service initiation and is also available online.⁵ The section discussing 911/E911 in the Subscriber Agreement is identified in bold font and prominently displayed (*see* Attachment B). In addition, the preliminary language in this section, which appears in capital letters, advises the customer to read the information contained therein. The Subscriber Agreement advises customers that E911 functionality is dependent on having a correct service address for the MTA and states that the subscriber must seek authorization from Comcast prior to moving the MTA to a new location. In addition, the Subscriber Agreement advises customers that 911/E911 service may not work in the event of a service interruption, such as a power outage or network failure.

All customers purchasing Comcast’s IP-enabled voice service are required to sign a Work Order at the time services are installed. The Work Order clearly states that the customer’s signature confirms receipt of and consent to the terms of the Subscriber Agreement. In addition, the Subscriber Agreement states clearly on page one in capital letters that customers consent to

⁵ The Residential Subscriber Agreement can be viewed at the following Internet address: <http://www.comcast.com/Products/Telephony/Tariffs.ashx?id=33&SType=2>. Customers of Comcast’s IP-enabled circuit-switched telephone service are subject to the terms of a tariff issued under authority of the Michigan Public Service Commission. The tariff can be viewed at the following Internet address: <http://www.comcast.com/Products/Telephony/Tariffs.ashx?id=16&SType=1>. Information regarding the limitations of liability of the circuit-switched telephone service with respect to emergency service can be found in section 2.5.A.14 of the tariff.

the terms of the Subscriber Agreement by enrolling in, using, or paying for the services provided. In short, customers indicate their acknowledgement and acceptance of the terms of service by both their signature and their actions.

In addition, even prior to the Commission's VOIP E911 Order, Comcast had prepared training materials for its customer service representatives to ensure that they can answer customer questions about the 911/E911 functionality of its interconnected VOIP service. Answers to frequently asked questions about Comcast's 911/E911 functionality have also been available for some time on Comcast's website ("E911 FAQ").⁶

Comcast is proud of the effort it has made to ensure that customers of its interconnected VOIP service have received appropriate information about the functionality and limitations of their E911 service prior to the Commission's addressing these issues in a rulemaking proceeding. Information regarding the additional steps Comcast has taken to ensure compliance with the Commission's VOIP E911 Order is set forth below.

1. Supplemental Notification

To supplement the information that was conveyed prior to the Commission's June 2005 order, Comcast has implemented four methods to provide advisory information to all customers and to seek once again their acknowledgement that they have received and understood that information.

First, on July 8, 2005, Comcast sent notifications via U.S. mail to the service address of every one of its existing customers of interconnected VOIP service advising them of the circumstances under which 911/E911 functionality may be in some way limited or unavailable

⁶ Comcast's E911 FAQ can be viewed at the following Internet address:
http://www.comcast.com/Support/Corp1/FAQ/Faq2_304_0.html

On subsequent dates, Comcast sent notifications to new customers who had interconnected VOIP services installed after the initial July 8, 2005 mailing. These mailings occurred on the following dates: July 15, July 19, July 22, July 28, August 4, and August 8. Future mailings to new customer are planned to occur on August 11, August 18 and August 25.

The notification was in each instance a simple, one-page letter written in plain English (*see* Attachment C.) Comcast's toll-free telephone number was provided for customers who have questions or concerns about the contents of the letter. The mailing also included a pre-paid postcard that repeated the disclosures contained in the letter and provided instructions for the customer to sign and return the postcard to acknowledge that he or she had received and understood the information contained in the letter (*see* Attachment D). These letters also included stickers, discussed below.

Second, on July 8, 2005, Comcast sent an email notification to each existing customer of interconnected VOIP service for whom it has an email address on file (*see* Attachment E). Email notifications were sent to new customers concurrent with the letter notifications described above. The email duplicates the information provided in the letter and prompts the customer to follow a hyperlink to an Internet address where the customer's acknowledgement is recorded electronically via a website form.⁷ On August 4, 2005, a second email was sent to each existing customer who had not yet provided an affirmative acknowledgement (a "non-responder") to the supplemental E911 advisory (*see* Attachment F).

Third, on July 20, 2005, Comcast implemented an automated system that places outgoing calls to non-responders. If the call is answered, a recorded message plays that contains information regarding Comcast's 911/E911 functionality. Customers are advised that they may

⁷ The website form used to obtain customer acknowledgement of the email notification can be viewed at the following Internet address: <http://cdv.comcast.net/911notification/>

dial zero at anytime to speak with a live operator. After the message plays, the customer is requested to press “1” to acknowledge having received and understood the information or “2” if the customer does not understand the information provided in the call. If the customer presses anything other than “1,” the call is transferred to a live agent to address any questions the customer may have about the notification. If the automated system detects voicemail or an answering machine, a message is left requesting that the customer call Comcast to receive important information about E911 service.

As of August 10, 2005, one hundred percent of all customers who have not responded to either the letter or email notification have received a call from Comcast’s automated system. In addition, in the event that a non-responder calls Comcast customer service, the customer service representative handling the call may request permission to transfer the customer to the automated system to receive and acknowledge the E911 information disclosure.

Fourth, starting July 30, 2005 on a market-by-market basis, Comcast has begun to require all new customers to read E911 disclosures at the time the interconnected VOIP services are installed.⁸ The disclosures are printed prominently on the Work Order provided to the customer by the Comcast technician installing services (*see, e.g.,* Attachment G). A statement in all capital letters just above the signature line emphasizes that signing the work order constitutes acknowledgement of having received and understood the E911 disclosures contained therein. Comcast has also developed training modules to ensure that the technicians installing service are able to answer any questions a customer may have regarding the 911/E911 functionality of the service.

⁸ The new work order will be in use in all markets by August 30, 2005. In the meantime, in any market in which the new work order is not yet available, new interconnected VOIP service customers are provided the E911 advisory through one of the other notification methods described above.

2. Stickers

On July 8, 2005, Comcast provided all existing customers of interconnected VOIP service with stickers describing the circumstances in which 911/E911 functionality may be limited or not available. These stickers were included with the letter notification mailings described above. Customers of interconnected VOIP service who had service installed after July 8, 2005 received stickers through the subsequent mailings described above. Each mailing contained one sheet of four stickers (*see* Attachment H). Customers were instructed to place the stickers on or near the equipment used with the interconnected VOIP service. In addition, the email notification sent to non-responders includes a link to a website location where the sticker image can be downloaded for printing onto sticker labels directly by the customer.⁹ Also, a link to the sticker image is included in the E911 FAQ that is available on Comcast's website. Starting August 22, 2005, stickers will be included in the Welcome Kit that is provided to new customers when interconnected VOIP service is installed.

3. Distribution and Acknowledgements

As discussed above, Comcast is proud of the effort it has made since it first started providing interconnected VOIP service to ensure that its customers have access to E911, even in the event of a power outage in the home or in the network, and that they are aware of any circumstances in which use of the service may be limited or unavailable. To that end, Comcast has always provided clear and understandable disclosures regarding any possible limitations of

⁹ Stickers can be downloaded using the following Internet address: http://obmail.comcastonline.com/ea-cgi/dtchttp.exe?vm_fetchLink:C=556&L=1&T=000000. In addition to the link to printable stickers, all customers also received hardcopy stickers via the letter notification mailings described above.

its interconnected VOIP service and required its customers to consent to the terms and conditions of service, including any such limitations.

Specifically, disclosures regarding Comcast's IP-enabled voice service have always been included in the Subscriber Agreement.¹⁰ Customers have been required to consent to the disclosures contained in the Subscriber Agreement by signing the Work Order when services are installed. In addition, by the terms of the Subscriber Agreement, the affirmative actions of enrolling in, using, or paying for the service constitute acceptance of its terms and limitations, including the limitations concerning 911 and E911 functionality. Accordingly, one hundred percent of customers of Comcast's IP-enabled voice service have provided an affirmative consent to the possible limitations in the 911/E911 functionality of that service.

In response to the Commission's goal to ensure that customers of interconnected VOIP services have a clear understanding of the technology they are using, Comcast has undertaken considerable further efforts to reaffirm its prior disclosures through additional notifications and stickers. To date, Comcast has sent supplemental advisory notifications and stickers to one hundred percent of existing customers of interconnected VOIP services. The percentage of customers that have not been provided both the supplemental E911 advisory and stickers is zero.

Since the Commission decision requiring supplemental notification of customers, Comcast has been receiving acknowledgements at the rate of several hundred per day and it has required a team of five full-time employees and three managers to review the acknowledgements and update customer records. Comcast is unable to provide an estimate of the percentage of

¹⁰ As noted previously, customers of Comcast's IP-enabled circuit-switched telephone service are bound by the terms of the tariff on file with the Michigan Public Service Commission, including the limitations on the availability of emergency service contained therein.

customers as of August 29, 2005 from whom it does not expect to receive response to this unprecedented solicitation as it has no basis on which to make this determination.

4. Follow-up Actions:

Comcast has worked diligently to ensure that all of its customers have received and understood the possible limitations of the 911/E911 functionality of the interconnected VOIP services it offers from the moment their service has been installed. In addition, following the Commission's VOIP E911 Order, Comcast has undertaken considerable additional efforts to reiterate the advisory information previously provided through direct mailings, telephone calls and emails and to obtain supplemental acknowledgements from each customer that he or she has received and understood this information. As described on the preceding pages, in addition to receiving letters, non-responders have been contacted three to five times via the automated calling system and two times via email. Comcast's efforts to date have been so comprehensive that it is now receiving complaints from some customers regarding the number of times Comcast has contacted them on this subject. Despite these efforts, certain customers simply decline to respond to Comcast's requests for acknowledgement that they have received and understood the supplemental notifications. Comcast is continuing to develop and evaluate additional mechanisms to ensure that it receives the supplemental acknowledgements without being overly intrusive to unresponsive customers.

5. Record-keeping:

Comcast has implemented multiple record-keeping mechanisms for the supplemental E911 acknowledgements received from its customers. The method varies depending on the

manner in which the acknowledgement is provided. Comcast has developed and established a centralized database for the specific purpose of tracking customer acknowledgements received pursuant to the multiple forms of communication it has implemented. The postcards are received at a central location and are stored in a fireproof filing cabinet. For the acknowledgements obtained via the automated calling system, Comcast retains an electronic file that shows the call path detail for each call, including the telephone number, confirmation that the message was played, and confirmation that the customer pressed one to signify having understood the information provided. The acknowledgements provided via the website form are stored in the tracking database described above. The acknowledgements provided via the signed Work Order initially are stored in metal filing cabinets or fireproof cabinets by the local markets. The time period for local storage varies by market but is generally within the range of six months to one year. After that time, the records are transferred to an off-site storage facility where they are maintained for a period of not less than six years.

6. Persons Responsible for Compliance

The chief executive responsible for Comcast's compliance with the VOIP E911 Order is:

Karen Gaines
Vice President Voice Operations
Comcast Cable Communications, LLC
1500 Market Street
Philadelphia PA 19102
(215) 320-7493
Karen_Gaines@Comcast.com

The legal/regulatory representatives responsible for Comcast's compliance with the VOIP E911

Order are:

John Sullivan
Vice President and Chief Counsel –
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Comcast Cable Communications, LLC
1500 Market Street
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CONCLUSION

As discussed above, Comcast is making every reasonable effort to ensure compliance with the Commission's supplemental notification requirements in the VOIP E911 Order. Representatives of Comcast would welcome the opportunity to discuss the matters presented in this Report should the Commission have any questions or require further information.

Respectfully submitted,

/s/ Joseph W. Waz Jr.
Joseph W. Waz Jr.
COMCAST CORPORATION
1500 Market Street
Philadelphia PA 19102

CERTIFICATE OF SERVICE

I, Valerie Yates, hereby certify that a copy of the foregoing Subscriber Notification Report filed by Comcast Corporation in WC Docket No. 05-196, DA 05-2085, was served this 10th day of August 2005 by electronic mail to the following persons.

/s/ Valerie Yates
Valerie Yates

Byron McCoy
Telecommunications Consumers Division
Enforcement Bureau
Federal Communications Commission
Room 4-A234
445 12th Street SW
Washington DC 20554
Byron.McCoy@fcc.gov

Janice Myles
Competition Policy Division
Wireline Competition Bureau
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ATTACHMENT A

EXCERPT FROM COMCAST DIGITAL VOICE USER GUIDE

HELP IS HERE

911 Emergency Calls

In most major cities, emergency police, fire, and medical services can be reached by dialing **9 1 1**. Enhanced 911(E911) automatically provides the emergency service with your telephone number and location when you dial 911 from your home phone. Remember, dial **9 1 1** immediately in case of any emergency.

Note: Please ensure that the service address for your Comcast Digital Voice service corresponds to your physical address to ensure proper E911 service. For limitations relating to 911/E911 dialing, please refer to the Comcast Digital Voice subscriber agreement.

DIRECTORY ASSISTANCE FEATURES

Directory Assistance

Just dial **4 1 1** for access to local, long-distance and international numbers.

Directory Assistance Call Completion

Dial **4 1 1** for access to both local and long-distance numbers, then press the indicated key and your call will be connected.

Enhanced Directory Assistance

Now when you dial **4 1 1**, you can get even more valuable information. Like what's playing at your local movie theater, show times, and ratings. You can also get fully interactive, turn-by-turn directions to any destination by a live operator. Or get the name of the nearest cross street for any listing you request.

Note: Directory Assistance calls are charged on a per-use basis. For prices, refer to the enclosed pricing list or call Customer Service.

OTHER SERVICES

Specialized Directory Listings

Comcast offers non-published directory listings only. This service ensures that your phone number is not available in either the phone book or through Directory Assistance.

Note: Non-published directory listings are available for a monthly charge. For prices, refer to the enclosed pricing list or call Customer Service.

TIPS FOR GETTING STARTED

- Throughout this guide you will notice that many of the calling features require you to press the ***** or **#** keys. You can find these keys on either side of the **0** on your telephone's key pad.
- Some of the calling features will require that you press the switchhook or flash button.
 - > On non-cordless telephones, the switchhook is the button that disconnects your call when you hang up. When instructed to press the switchhook, be sure to press it firmly, and then release it to ensure that the feature is activated. Do not press it too long, however, or the call may be disconnected.
 - > On cordless telephones, you will find a flash button located on the telephone's key pad.
- Some of the calling features will require that you create a list (e.g. priority list, block list, etc.). These lists are distinct from one another and will remain stored so that each time you activate a particular feature, it will refer to the list you created.
- Rotary telephones are not compatible with Comcast Digital Voice service.

ONLINE BILL ACCESS

Your Comcast Digital Voice monthly billing statement will include a summary of charges you've incurred for the month. In order to view call details, you will need to access your bill online through www.comcast.com. Registration is fast, easy, and free. First-time users will be prompted to create a user profile and password. Returning users can log in by entering their user name and password.

1. Go to www.comcast.com/viewbill.
2. Enter your user name and password.
3. Follow prompts to view billing statements, make payments, order services, and more.

ATTACHMENT B

EXCERPT FROM COMCAST DIGITAL VOICE

RESIDENTIAL SUBSCRIBER AGREEMENT

d. Comcast's Access to Customer's Premises:

Access: From time to time, Comcast may need to enter the premises at which you will use the Services ("Premises") in order to install, maintain, inspect, repair, and remove the Comcast Equipment. Accordingly, you authorize Comcast and its employees, agents, contractors, and representatives to enter the Premises as necessary, at a time agreeable to you and us.

Authorization for Access: You warrant either that you are the owner of the Premises, or if you are a tenant, that you have the authority to afford us access to the Premises. If you are not the owner of the Premises, you agree to supply us, if we ask, the owner's name and address, evidence that the owner has authorized you to grant access to the Premises, and/or written consent from the owner.

3. LIMITATIONS OF 911/E911 DIALING

Limitations: The Services include 911/Enhanced 911 dialing ("911/E911") that may differ from the 911 or Enhanced 911 dialing furnished by other providers. As such, it may have certain limitations. CAREFULLY READ THE INFORMATION BELOW. YOU ACKNOWLEDGE AND ACCEPT ANY LIMITATIONS OF 911/E911. YOU AGREE TO ADVISE ALL PERSONS WHO MAY HAVE OCCASION TO PLACE CALLS OVER THE SERVICES OF THESE LIMITATIONS.

Correct Address: For 911/E911 to work in accordance with our specifications, Comcast must have a correct service address for the location of your MTA. If you do not provide the correct address when you register for the Services or if you relocate your MTA to a new address and do not register the new address with Comcast, 911/E911 may fail in two ways: (i) 911/E911 calls may be misdirected to the wrong emergency authorities, and (ii) emergency authorities will be given the wrong address for the origin of your E911 calls. If you wish to relocate the MTA and continue to use the Services including 911/E911, you must comply with sections 2.c and 8.d, seek authorization for the Services at your new service address (if available), and update your service address with us.

Service Interruptions: 911/E911 may not function if the Services are interrupted for any reason, including but not limited to failure of your MTA, incorrect configuration of your MTA, a power outage, failure of our network or facilities, or suspension or disconnection of your services because of nonpayment.

LIABILITY: YOU ACKNOWLEDGE AND UNDERSTAND THAT COMCAST WILL NOT BE LIABLE FOR ANY SERVICE OUTAGE, INABILITY TO DIAL 911 USING THE SERVICES, AND/OR INABILITY TO ACCESS EMERGENCY SERVICE PERSONNEL DUE TO THE 911/E911 FEATURE OR LIMITATIONS SET FORTH IN THIS AGREEMENT. YOU AGREE TO DEFEND, INDEMNIFY, AND HOLD HARMLESS COMCAST, ITS OFFICERS, DIRECTORS, EMPLOYEES, AFFILIATES, AND AGENTS, AND ANY OTHER PROVIDER WHO FURNISHES SERVICES TO YOU IN CONNECTION WITH THE SERVICES, FROM ANY AND ALL CLAIMS, LOSSES, DAMAGES, FINES, PENALTIES, COSTS, AND EXPENSES (INCLUDING BUT NOT LIMITED TO REASONABLE ATTORNEY FEES) BY, OR ON BEHALF OF, YOU OR ANY THIRD PARTY OR USER OF THE SERVICES RELATING TO THE FAILURE OR OUTAGE OF THE SERVICES, INCLUDING THOSE RELATED TO 911/E911.

4. SERVICE INTERRUPTIONS CAUSED BY POWER FAILURES

You expressly acknowledge that you may lose access to and use of the Services, including 911/E911, under certain circumstances, including but not limited to the following: (i) if our network or facilities are not operating, (ii) if electrical power to the MTA is interrupted and the MTA does not have a battery backup, and (iii) if the electrical power to the MTA is interrupted and its battery backup fails. You also understand and acknowledge that battery backup may provide power for only a limited time, that the performance of the battery backup is not guaranteed, and that if the battery is exhausted, the Services will not function until normal power is restored. You acknowledge and understand that your MTA may not have battery backup or another power source of its own.

5. INCOMPATIBILITY OF THE SERVICES WITH CERTAIN EQUIPMENT, SERVICES, AND ACTIVITIES

a. Incompatible Equipment and Services:

You acknowledge and understand that the Services may not support or be compatible with:

- i.** Non-Recommended Configurations as defined in Section 2.b (including but not limited to MTAs not currently certified by Comcast as compatible with the Services);
- ii.** Certain non-voice communications equipment, including but not limited to alarm or home security systems that make automatic phone calls; medical monitoring devices; certain fax machines; and certain "dial-up" modems;
- iii.** Rotary-dial phone handsets, pulse-dial phone handsets, and models of other voice-related communications equipment such as answering machines and traditional Caller ID units;
- iv.** Casual/dial around (10-10) calling; 976, 900, 700, or 500 number calling;
- v.** 311, 511 or other x11 calling (other than 411, 611, 711, and 911); and
- vi.** Other call types not expressly set forth in our product literature (e.g., outbound shore-to-ship calling and outbound satellite calling).

BY ACCEPTING THIS AGREEMENT, YOU WAIVE ALL CLAIMS AGAINST COMCAST FOR INTERFERENCE, DISRUPTION, OR INCOMPATIBILITY BETWEEN THE COMCAST EQUIPMENT OR THE SERVICES AND ANY OTHER SERVICE, SYSTEMS, OR EQUIPMENT. IN THE EVENT OF SUCH INTERFERENCE, DISRUPTION, OR INCOMPATIBILITY, YOUR SOLE REMEDY SHALL BE TO TERMINATE THE SERVICES IN ACCORDANCE WITH SECTION 10.B.

b. You Assume the Risk of High-Risk Activities:

As further discussed in Section 12.a, the Services are not represented as fail-safe. They are not designed for use in situations where error-free or uninterrupted service is essential. You expressly assume the risk of any damages from high-risk activities involving vital communications in which an error or interruption in the Services could lead to material injury to business, persons, property, or the environment.

ATTACHMENT C

LETTER NOTIFICATION



Comcast
1500 Market Street
Philadelphia, PA 19102-2148

Dear Customer,

Thank you for making a great choice in home phone service with Comcast Digital Voice.[™] Comcast is excited to provide you this great new service and from time to time, we'll keep you updated with information about your service. This month, we are highlighting 911 emergency services.

At Comcast we want you to have a safe way to communicate in times of emergency. Because your safety is important to us, Comcast Digital Voice (CDV) offers Enhanced 911 service and limited battery back-up in the event of a power outage in your home. Enhanced 911 allows us to deliver your address and call-back number automatically to local 911 emergency services personnel when you need help.

The FCC has asked Comcast to make sure you receive and understand important information about the E911 feature of your Comcast Digital Voice service. This information is included in the attached business response card. Please complete and return the attached business response card no later than **July 25, 2005**.

If you want more information about our E911 feature, you can call us any time at **1-800-COMCAST** or check our web site at <http://www.comcast.com/digitalvoice> and select "FAQs." We will be happy to answer your questions about Comcast Digital Voice.

Thank you for your business,

A handwritten signature in black ink that reads "Karen Gaines".

Karen Gaines
Vice President, National Telephony Care

P.S. As a reminder, we have enclosed stickers that provide important information about 911.

You should place these stickers on or near the phones used in your household with Comcast Digital Voice service.

ATTACHMENT D

POSTCARD

PLEASE REPLY BY JULY 25, 2005

This card will confirm that I received and understand the following information about my Comcast Digital Voice™ service:

- Comcast Digital Voice service needs a correct service address to deliver my proper location information to 911. If I wish to move my Comcast Digital Voice service to a different address, I must first contact Comcast to ensure my E911 service works properly. Comcast will need several business days to update my service address in the Enhanced 911 system.
- Like other IP-based phone services and traditional cordless phones, Comcast Digital Voice uses the electrical power in my home. I may not be able to make 911 calls if there is an extended power outage or if there is a network or other technical problem.
- If I have any questions about the information I've received today or about Comcast Digital Voice's Enhanced 911 feature generally, I will call 1-800-COMCAST.

_____ I understand this information about my Comcast Digital Voice service.

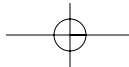
Account Holder Signature: _____

Print Name: _____

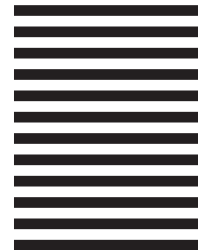
Phone Number: _____

Today's Date: _____

THANK YOU FOR YOUR RESPONSE!



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



BUSINESS REPLY MAIL

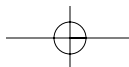
FIRST-CLASS MAIL

PERMIT NO. 6336

PHILADELPHIA, PA

POSTAGE WILL BE PAID BY ADDRESSEE

COMCAST
ATTENTION: CDC
5800 S. QUEBEC STREET
GREENWOOD VILLAGE, CO 80111



ATTACHMENT E
FIRST EMAIL NOTICE

From: Comcast Digital Voice
Sent: Wednesday, July 13, 2005 10:54 AM
To:
Subject: Important 911 Information Regarding your Comcast Digital Voice Service



Dear Customer,

Thank you for making a great choice in home phone service with Comcast Digital Voice.™ Comcast is excited to provide you this great new service and from time to time, we'll keep you updated with information about your service. This month, we are highlighting 911 emergency services.

At Comcast we want you to have a safe way to communicate in times of emergency. Because your safety is important to us, Comcast Digital Voice (CDV) offers Enhanced 911 service and limited battery backup in the event of a power outage in your home. Enhanced 911 allows us to deliver your address and call-back number automatically to local 911 emergency services personnel when you need help.

The FCC has asked Comcast to make sure you receive and understand important information about the E911 feature of your Comcast Digital Voice service. This information is located at <http://cdv.comcast.net/911notification>. Please review the information and complete the electronic form no later than July 18, 2005.

If you want more information about our E911 feature, you can call us any time at 1-800-COMCAST or check our web site at <http://www.comcast.com/digitalvoice> and select "FAQs." We will be happy to answer your questions about Comcast Digital Voice.

Thank you for your business,
Karen Gaines
Vice President, National Telephony Care

P.S. As a reminder, you can download printable stickers that provide important information about 911. You should place these stickers on or near the phones used in your household with Comcast Digital Voice service.

**Remember that
Comcast will
never
ask for your
password or
billing
information
via e-mail.**

**[Click Here to
Learn More >>](#)**

ATTACHMENT F
SECOND EMAIL NOTICE

From: Comcast Digital Voice
Sent: Tuesday, August 02, 2005 1:44 PM
To:
Subject: Important 911 Information Regarding your Comcast Digital Voice Service



Dear Customer,

Thank you for making a great choice in home phone service with Comcast Digital Voice.™ Comcast is excited to provide you this great new service and from time to time, we'll keep you updated with information about your service. This month, we are highlighting 911 emergency services.

At Comcast we want you to have a safe way to communicate in times of emergency. Because your safety is important to us, Comcast Digital Voice (CDV) offers Enhanced 911 service and limited battery backup in the event of a power outage in your home. Enhanced 911 allows us to deliver your address and call-back number automatically to local 911 emergency services personnel when you need help.

The FCC has asked Comcast to make sure you receive and understand important information about the E911 feature of your Comcast Digital Voice service. This information is located at <http://cdv.comcast.net/911notification>.

Important: Based on a recent ruling by the Federal Communications Commission, if you do not respond to this notice by August 29, 2005, Comcast may be required to suspend your service.

If you want more information about our E911 feature, you can call us any time at 1-800-COMCAST or check our web site at http://www.comcast.com/Support/Corp1/FAQ/Faq2_304_0.html. We will be happy to answer your questions about Comcast Digital Voice.

Thank you for your business,
Karen Gaines
Vice President, National Telephony Care

P.S. As a reminder, you can download printable stickers that provide important information about 911. You should place these stickers on or near the phones used in your household with Comcast Digital Voice service.

Remember that
Comcast will never
ask for your
password or billing
information
via e-mail.

[Click Here to
Learn More >>](#)

ATTACHMENT G

EXAMPLE OF NEW WORK ORDER DISCLOSURE

INSTALLER JOB

SCHEDULE DATE

ADDRESS

HSE COMMENT

NAME

PHONE

SALESPERSON

ORDER DATE

SPECIAL INSTRUCTS AND COMMENTS

comcast.

/BUS

CAMPAIGN

OPR

| | | |
|--|----------|---------|
| ACCOUNT NO.: | SERVICES | CHARGES |
| INSTALLATION CHARGE | \$ | |
| MONTHLY SERVICE CHARGE EXCLUDES TAXES AND FEES | \$ | |
| DEPOSIT | \$ | |
| PAID IN ADVANCE | \$ | |
| PRORATE | \$ | |

WORK COMPLETED

DATE INSTALLED

TIME IN

TIME OUT

INSTALLER

MONEY RECEIVED

3 Calls N/ATC

1st

2nd

3rd

PAYMENT

☐ CASH

☐ MO

☐ CHECK #

☐ VISA/MASTERCARD #

DEPOSIT

CONVERTERS

LOCATION

By signing below, I represent that I am at least 18 years old; I am the owner of, or tenant in, the premises at the above address and that the installation, repair or other work provided has been satisfactorily completed. If this Work Order relates to the initial installation of services, I acknowledge receipt of Comcast's Welcome Kit(s) which contain the Comcast subscriber agreement(s), the Comcast subscriber privacy notice(s) and other important information about the service(s). I agree to be bound by the Comcast subscriber agreement(s) which constitute the agreement(s) between Comcast and me for the service(s). If other non-installation work was provided, I agree to continue to be bound by the current Comcast subscriber agreement(s). I authorize Comcast to obtain a credit report from a consumer credit agency in connection with the provision of the service(s) I am receiving. IF I SUBSCRIBE TO COMCAST DIGITAL VOICE, I ACKNOWLEDGE MY RECEIPT AND UNDERSTANDING OF THE E911 NOTICE ON THE BACK.

SUBSCRIBER SIGNATURE

TECHNICIAN SIGNATURE

TECHNICIAN NUMBER

DATE

COMMUNICATION GRAPHICS (215) 646-2225

Form # 1032

REV. 07/05

B

ATTACHMENT H

STICKERS

Instructions: Place these stickers on or near equipment used in your household with Comcast Digital Voice.™

**E911 Notice for
Comcast Digital Voice (CDV)**

FCC rules require that IP-based phone providers remind you about these important 911 facts: Comcast needs a correct service address to deliver your proper location information to E911. If you move CDV equipment to a different address, call Comcast at 1-800-COMCAST. CDV uses the electrical power in your home. You may not be able to make 911 calls if there is an extended power outage or CDV experiences network or other technical problems.

**E911 Notice for
Comcast Digital Voice (CDV)**

FCC rules require that IP-based phone providers remind you about these important 911 facts: Comcast needs a correct service address to deliver your proper location information to E911. If you move CDV equipment to a different address, call Comcast at 1-800-COMCAST. CDV uses the electrical power in your home. You may not be able to make 911 calls if there is an extended power outage or CDV experiences network or other technical problems.

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